

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN**

BRENDA STRAIT, as Personal  
Representative of the Estate of Danny  
Whitney, Deceased,

Plaintiff,

v.

Case No. 14-cv-00630

Hon. Paul L. Maloney

COUNTY OF GRAND TRAVERSE,  
SHERIFF THOMAS BENSLEY,  
DEPUTY SCOTT MARTIN,  
SERGEANT ED LASSA, CORRECTIONAL  
HEALTHCARE COMPANIES, INC.,  
HEALTH PROFESSIONALS, LTD, P.C.,  
STEPHANIE L. MILLER, LPN, and  
WILFRED P. SALDANHA, MD,  
Jointly and Severally,

Defendants.

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**REPLY TO DEFENDANTS, COUNTY OF GRAND TRAVERSE, SHERIFF BENSLEY,  
DEPUTY MARTIN AND SGT. ED LASSA'S AFFIRMATIVE DEFENSES**

Plaintiff, BRENDA STRAIT, as Personal Representative for the Estate of Danny Whitney, deceased, by and through their attorneys, JOHNSON LAW, PLC, for their responses to Defendants' Affirmative Defenses states as follows:

1-24. Denied.

25. Plaintiffs deny that Defendant is entitled to reserve the right to name additional affirmative defenses as they become known during the course of discovery because an attempted reservation is in contravention of Federal Court Rules.

Respectfully submitted,

**JOHNSON LAW, PLC**

By: /s/ Juliana B. Sabatini  
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Dated: July 22, 2014

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 22, 2014, I electronically filed the foregoing paper with the Clerk of the Court using the Court ECF system which will send notification of such filing to the following:

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Respectfully submitted,

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